

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-CV-1076 (GBD)

**The O'Neill Plaintiffs' Motion for Entry of Default Judgment Solely as to Liability
Against the Publication Defendants**

PLEASE TAKE NOTICE that upon the affidavit of Jerry S. Goldman, Esq., and the exhibits attached thereto, the *O'Neill* Plaintiffs, by and through their counsel, Anderson Kill, P.C., will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting the *O'Neill* Plaintiffs' motion for entry of default judgment solely as to liability against the defendants listed in Exhibit 1 to the affidavit of Jerry S. Goldman.

Dated: September 18, 2015
New York, New York

/s/ Jerry S. Goldman
Jerry S. Goldman, Esquire
ANDERSON KILL P.C.
1251 Avenue of the Americas
42nd Floor
New York, NY 10020
Attorneys for the O'Neill Plaintiffs